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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No.: CR 06-0181 VRW
Plaintiff,	)	
v.	)	STIPULATION AND <del>[PROPOSED]</del>
	)	ORDER EXCLUDING TIME UNDER
JOSE JESUS QUINONES, and	)	THE SPEEDY TRIAL ACT
LORENZO ROBLES,	)	
	)	
Defendants.	)	

On Tuesday, May 16, 2006, the parties appeared before the Court for a status hearing and motions and trial setting. The United States was represented by Assistant United States Attorney Alexis Hunter, who appeared on behalf of her colleague Dennis Michael Nerney. Defendant Jose Quinones was represented at the proceeding by Daniel Blank of the Office of the Federal Public Defender. Defendant Lorenzo Robles was represented by Kenneth Wine. The case was set for a further status hearing.

During the proceeding the parties jointly requested a continuance of the case to Tuesday, July 18, 2006 at 10:30 a.m. AUSA Hunter represented that a large amount of wiretap evidence (including numerous audio recordings, reports, and transcripts) is to be turned over to the defendants in the coming days. The parties agreed that for such reason, counsel for the

1 defendants would require a reasonable amount of time to review the discovery, confer with their  
2 clients, investigate the case further, and confer with government counsel, AUSA Nerney. The  
3 parties requested the continuance to July 18<sup>th</sup> in order to give the defendants an opportunity to  
4 accomplish this objective.

5 The parties jointly requested that the time period from May 16, 2006 through and  
6 including July 18, 2006 be excluded from the calculation of time under the Speedy Trial Act.  
7 The defendants, through their counsel, consented to this exclusion of time.

8 Specifically, the parties moved to have the time from May 16, 2006 through and  
9 including July 18, 2006 excluded from the time limits set forth in the Speedy Trial Act, 18  
10 U.S.C. § 3161, on the ground that failure to exclude the time would unreasonably deny counsel  
11 for the defendants the reasonable time necessary for effective preparation of counsel, taking into  
12 account the exercise of due diligence. 18 U.S.C. § 3161(h)(8)(B)(iv). In addition, the ends of  
13 justice would be served by the Court excluding the proposed time period; these ends outweigh  
14 the best interest of the public and the defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(8)(A),  
15 (B)(iv).

16 With the consent of the parties, the period from May 16, 2006 through and including  
17 July 18, 2006 shall be excluded from the Speedy Trial Act calculation under 18 U.S.C.

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1 § 3161(h)(8)(A) and (B)(iv).

2 SO STIPULATED.

4 DATED:

DANIEL BLANK  
Counsel for Jose Jesus Quinones

7 DATED:

5/18/06

KENNETH WINE  
Counsel for Lorenzo Robles

10 DATED: 5/18/06

Alexis Hunter  
ALEXIS HUNTER for Dennis Michael Nerney  
Assistant United States Attorney

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 DATED:

VAUGHN R. WALKER  
UNITES STATES DISTRICT JUDGE

1 § 3161(h)(8)(A) and (B)(iv).

2 SO STIPULATED.

3  
4 DATED: 8/19/06

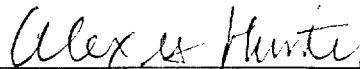


DANIEL BLANK  
Counsel for Jose Jesus Quinones

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6  
7 DATED:

KENNETH WINE  
Counsel for Lorenzo Robles

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10 DATED: 5/18/06

  
ALEXIS HUNTER for Dennis Michael Nerney  
Assistant United States Attorney

11  
12  
13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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15 DATED: May 24, 2006

  
VAUGHN R. WALKER  
UNITES STATES DISTRICT JUDGE